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County of Asotin )

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**May 17, 2022**

SEAN F. McAVOY, CLERK

*In re Affidavit in Support of a Criminal Complaint as to Steven Young*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Thomas Brennan, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint seeking the arrest of Steven YOUNG for violating 18 U.S.C. §§ 922(g)(1), 924(a)(2), Felon in Possession of a Firearm. Based on my training and experience and the facts as set forth in this affidavit, I submit there is probable cause to believe that YOUNG has committed this federal criminal law violation.

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since March 2018. I have served as a Special Agent with the FBI in the Salt Lake Division, Lewiston Resident Agency since October 2018. As part of my enforcement duties, I am statutorily charged with investigating federal criminal violations, including federal crimes committed on Indian Reservations under special jurisdiction of the United States Government. Prior to joining the FBI, I served as a U.S. Department of State Diplomatic Security Service Special Agent for four years and an Assistant to the Director of Policy & Planning at the NYPD Counterterrorism Bureau for two years. As a Federal Agent, I am

authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I have been an investigative case agent involving federal law violations including kidnapping, assault, assault on a federal officer, firearms offenses, homicide, sexual assault, child abuse, domestic violence, sale and distribution of illegal narcotics, identify theft, passport fraud, visa fraud, and cyberstalking. In the course of these investigations, I have obtained and executed search warrants and arrest warrants, conducted surveillance, interviews, and employed consensually monitored confidential informants.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other Special Agents, Task Force Officers, other law enforcement officers from various agencies, and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

### **INVESTIGATION**

4. The United States, including the FBI, is conducting a criminal investigation of Steven K. YOUNG (“YOUNG”) and others regarding possible violations of federal laws. I am familiar with YOUNG due to a multi-year, multi-agency, drug trafficking investigation in Lewiston, Idaho, Clarkston, Washington, and the Nez Perce Indian Reservation. In this investigation, YOUNG was identified as a drug trafficker known by Task Force Officers and Agents to be facilitating the movement of large quantities of drugs from Spokane, Washington to the Lewis & Clark Valley.

5. I reviewed a report concerning a law enforcement contact with YOUNG that occurred on January 7, 2021 in Whitman and Asotin Counties in the Eastern District of Washington. The report stated that Whitman County Sheriff’s Office (“WCSO”) Deputy Tyler Affidavit of Special Agent Brennan (22-mj-00153-JAG) - 2

Langerfeld attempted to conduct a traffic stop on a vehicle traveling on State Route 128 after observing a traffic violation. Rather than yielding to the authority of the Sheriff's Deputy's red and blue emergency lights, the driver of the vehicle, later identified as YOUNG, accelerated across Red Wolf Bridge and into Asotin County. YOUNG entered Clarkston, Washington and drove approximately 75 mph through the center of the roadway into oncoming lanes of traffic. YOUNG subsequently traveled airborne and wrecked the vehicle. YOUNG got out and rushed to the rear of the vehicle while a WCSO Deputy issued commands to get on the ground. YOUNG and two other occupants in the vehicle complied with the Deputy's commands. When other law enforcement officers arrived, Deputies placed YOUNG in handcuffs. While being handcuffed, the Deputy asked YOUNG if he had a gun on him, and YOUNG advised "there's one in the car that's owned by the owner." Officers advised YOUNG that he was under arrest and told YOUNG that he had the right to remain silent and the right to an attorney.

6. After placing YOUNG in his patrol car, Dep. Langerfeld looked through the open driver's door of the vehicle. Dep. Langerfeld's report states that on the front floorboard where YOUNG was sitting, Dep. Langerfeld observed a grey safe and a revolver handgun. Dep. Langerfeld was aware that both YOUNG and the other two occupants of the vehicle were convicted felons and prohibited from possessing firearms.

7. Dep. Langerfeld returned to his patrol car and told YOUNG again that he was under arrest and advised him of his *Miranda* rights. YOUNG was searched incident to arrest. During the search, Dep. Langerfeld located a clear glass pipe with a white substance inside and an unused hypodermic needle. In my training and experience as well as my knowledge of YOUNG's prior involvement in drug trafficking, I am aware that white substances inside of glass pipes are consistent with methamphetamine. Dep. Langerfeld also located an envelope in

Affidavit of Special Agent Brennan (22-mj-00153-JAG) - 3

YOUNG's pocket with approximately \$5,225.00 in cash. At some point during this incident, a female identifying herself as the registered owner of the vehicle called into dispatch and advised the firearm in the vehicle was hers.

8. YOUNG was transported to county jail and the other two occupants were released from the scene. WCSO seized YOUNG's vehicle pending their application for a search warrant.

9. After midnight, on January 8, 2021, Dep. Langerfeld applied for and was granted a search warrant for YOUNG's vehicle by Whitman County District Court Judge John Hart. During the search of the vehicle, Deputies located a purple and silver Charter Arms .38 Special revolver bearing serial number 11-07655 with 4 rounds in the chamber on the driver's floorboard. Inside of the safe on the driver's floorboard, Deputies recovered multiple used baggies with brown residue, a silver/blue digital scale, a spoon with burnt residue, and a piece of foil with burnt residue. Based on my training and experience, I am aware that small baggies and a digital scale are used to package large quantities of drugs into smaller quantities for distribution and sale to other individuals. I am also aware that individuals involved in the sale and distribution of narcotics use firearms for intimidation as well as for protection against robberies of both product and bulk cash by other drug dealers. Under the driver's seat, deputies located a black metal box containing other items of drug paraphernalia that contained white crystal residue. In the glove box, was a holster that appeared to be able to fit the seized firearm. All the seized evidence was placed into secure evidence storage.

10. Later that morning of the same day, Deputies interviewed YOUNG at the WCSO. YOUNG was again advised of his *Miranda* rights and agreed to speak with investigators by signing his Advisement of Rights card. YOUNG told deputies that he borrowed the vehicle from another individual in Lewiston, Idaho and while driving he looked down and saw a firearm at his

Affidavit of Special Agent Brennan (22-mj-00153-JAG) - 4

feet. YOUNG told deputies that he did not know what to do because he was a convicted felon. When YOUNG saw Dep. Langerfeld behind him, YOUNG “took off” and did not notice that he was driving in the oncoming lane of traffic at approximately 80 mph even though the speed limit was 35 mph. YOUNG stated that he had just purchased a Google Home Mini and that the box belonged to YOUNG. As referenced above, this box was located under the driver’s seat next to the handgun and is the box in which deputies recovered a digital scale. Finally, YOUNG offered three different stories as to where he obtained the \$5,225 located on his person. YOUNG subsequently bonded out of jail and was released back into the community.

11. On April 5, 2022, FBI Task Force Officers and Detectives assigned to the Quad Cities Drug Task Force attempted to arrest YOUNG in Lewiston, Idaho on multiple felony warrants out of Washington and Idaho. During the attempted arrest, all detectives were wearing body armor with the word “POLICE” written across the chest. After being told to get out of his vehicle, YOUNG drove at a high rate of speed in reverse into the vehicle of an FBI TFO, who dove out of the car to avoid getting injured. YOUNG then drove forward at a high rate of speed and struck a separate FBI TFO in the knee with YOUNG’s vehicle before YOUNG escaped out of an alley and fled into the community. I reviewed reports associated with this attempted arrest.

I also spoke to both TFOs, who told me that they were in fear of serious bodily injury during this incident.

12. On April 15, 2022, the Lewiston Regional SWAT team took YOUNG into custody after YOUNG barricaded himself inside of a residence in Juliaetta, Idaho.

13. On May 12, 2022, I took custody of the firearm seized from YOUNG and placed it in secure storage at the FBI Lewiston Resident Agency.

14. Your affiant reviewed YOUNG's criminal history and observed that YOUNG was previously convicted of felony Child Molestation in Garfield County, Washington and received a sentence of 20 months of custody. Additionally, he has a felony conviction for Failure to Register and received a sentence of 16 months. Additionally, YOUNG has a documented felony conviction Possession of a Controlled Substance (LSD) in Nez Perce County, Idaho. YOUNG is therefore prohibited from possessing firearms.

15. Your affiant conducted research into Charter Arms, the manufacturer of the .38 Special revolver seized from YOUNG's floorboard, and determined that Charter Arms is headquartered in Shelton, Connecticut and there are no known manufacturing facilities in Washington. It is therefore reasonable to assume that the firearm traveled in interstate commerce in order to be located at YOUNG's feet next to drug trafficking materials in Asotin County, Washington.

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16. Based on the foregoing, I submit that there is probable cause to believe that on or about January 7, 2021, YOUNG committed the offenses of Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

Respectfully submitted,



Thomas J. Brennan  
Special Agent  
Federal Bureau of Investigation

Sworn to telephonically and signed electronically on this 17<sup>th</sup> day of May 2022.



James A. Goeke  
United States Magistrate Judge